

Honorable Thomas S. Zilly

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID A. GOULD, et al.,

Defendants.

Case No. 2:16-cv-1041-TSZ

**UNITED STATES' RESPONSE TO  
ORDER TO SHOW CAUSE**

The United States of America hereby responds to the Court's Minute Order of January 21, 2022 (Dkt. 152). The Order directs the parties to show cause why this matter should not be dismissed for failure to file monthly status reports as required by the Court's Order of March 10, 2020 (Dkt. 136). That Order stayed this action to allow for progress on settlement efforts.

The United States last filed a status report on September 14, 2021. The failure to file a monthly status report since then is an oversight on the United States' part for which the United States apologizes to the Court. In the fall of 2021, counsel for the United States had a multi-day trial and court appearances in other matters, which interrupted the usual practices in this matter. With this response, the United States is reporting the status of settlement discussions and will resume filing status reports by the first of each month.

1 Counsel for the United States has been communicating with counsel for Defendant Jane  
2 Polinder to reach agreement on Ms. Polinder's tax liabilities for the relevant years. There has  
3 been some delay because, apart from delays resulting from pandemic-related restrictions, the  
4 property at issue in this action is Ms. Polinder's primary residence. The parties believe they have  
5 determined how to address that problem. The parties should be able to resolve the remaining  
6 issues in short order.

7 The United States appreciates the Court's patience in this action.

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9  
10 Dated: February 3, 2022

Respectfully submitted,

11 DAVID HUBBERT  
12 Deputy Assistant Attorney General

13 /s/ Charles J. Butler  
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24 United States Attorney  
25 Western District of Washington

26 *Attorneys for the United States of America*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 3, 2022, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will provide electronic notice to all parties that have appeared in this action.

s/ Charles J. Butler  
CHARLES J. BUTLER  
Trial Attorney, Tax Division  
U.S. Department of Justice